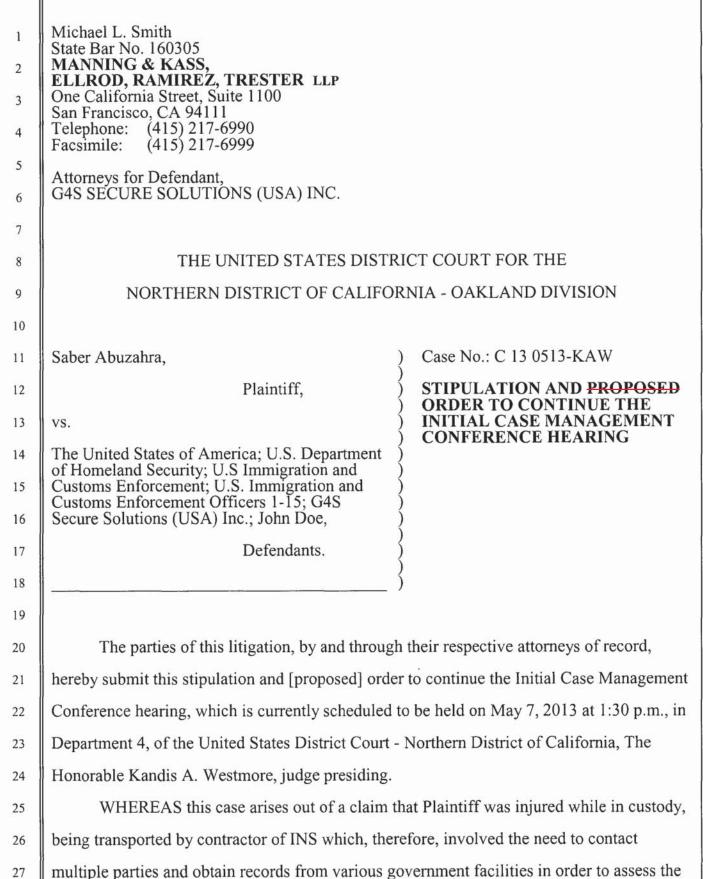
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case for settlement;

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WHEREAS both sides have moved efficiently with purpose to acquire the initial 1 basic information needed to evaluate and commence settlement negotiations; 2 WHEREAS the parties are engaged in an extremely productive, very promising 3 settlement negotiations which, if successful, will result in a global resolution;. 4 WHEREAS with the Initial Case Management Conference scheduled for May 7, 5 2013, and an April 30, 2013 deadline to submit Rule 26 Disclosures, that the parties and 6 counsel agree that the time, effort and expense needed to comply on the current tract will 7 impede the ongoing settlement negotiations and result in Defendants being forced to incur 8 fees and costs that might otherwise more productively be allocated toward continuing 9 settlement negotiations. 10 Accordingly, based on the foregoing good cause shown, the parties to this matter, by 11 and through their respective attorneys of record, hereby stipulate and jointly and respectfully 12 request that the Initial Case Management Conference hearing, currently scheduled for May 13 7, 2013, at 1:30 p.m., be continued for two weeks to Tuesday, May 21, 2013 at 1:30 p.m., or 14 to any date thereafter the Court is available. 15 IT IS SO STIPULATED: 16 17 MANNING & KASS Dated: April 29, 2013 18 ELLROD, RAMIREZ, TRESTER LLP 19 By: /s/ Michael Smith 20 Michael L. Smith 21 Attorneys for Defendant, G4S Secure Solutions (USA) Inc. 22 23 JOHNSON & MCDERMED LLP Dated: April 29, 2013 24 25 /s/ Jeremiah Johnson By: 26 Jeremiah Johnson 27 Attorneys for Plaintiff. Saber Abuzahra 28

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Good cause appearing, the Initial Case Management Conference hearing, currently
scheduled for May 7, 2013, at 1:30 p.m., shall be continued to May 21, 2013, at 1:30 p.m.
The Initial Case Management Conference Statement shall be filed on or before May 14,
2013.
IS SO ORDERED:
Date: 4/30 , 2013 KANDIS A. WESTMORE UNITED STATES DISTRICT MAGISTRATE JUDGE
ONTED STATES DISTRICT MAGISTRATE JODGE